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15 *Pro hac applications to be submitted

16 Attorneys for BLUE CROSS BLUE
17 SHIELD HEALTHCARE PLAN OF
18 GEORGIA, INC.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SUNRISE MOUNTAINVIEW
HOSPITAL, INC. D/B/A
MOUNTAINVIEW HOSPITAL; and
SOUTHERN HILLS MEDICAL
CENTER, LLC D/B/A SOUTHERN
HILLS HOSPITAL AND MEDICAL
CENTER,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD
HEALTHCARE PLAN OF GEORGIA,
INC.,

Defendants.

Case No. 2:23-cv-00992-MMD-BNW
Hon. Miranda M. Du

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DEFENDANT'S TIME TO RESPOND
TO COMPLAINT BY 30 DAYS**

(FIRST REQUEST)

Action Filed: June 27, 2023

Plaintiffs Sunrise Mountainview Hospital, Inc. d/b/a Mountainview Hospital and Southern Hills Medical Center, LLC d/b/a Southern Hills Hospital and Medical Center (“Plaintiffs”) and Defendant Blue Cross Blue Shield Healthcare Plan of Georgia, Inc. (“Defendant”) (collectively the “Parties”) hereby stipulate, by and through their respective counsel of record, and subject to the Court’s approval, as follows:

1. Plaintiffs filed the Complaint in this action on June 27, 2023 (ECF #1), and Defendant was served with the Summons and Complaint on July 3, 2023.

2. Defendant's current deadline to move, answer or otherwise respond to the Complaint is July 24, 2023.

3. Defendant requires additional time to prepare its response to the Complaint.

4. The Parties therefore agree, subject to the Court's approval, to extend the deadline for Defendant to answer, move or otherwise respond to the Complaint by thirty (30) days, to August 23, 2023.

5. The Parties agree that good cause exists for this extension.

6. This is Defendant's first requested extension.

THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval, that Defendant's deadline to answer, move or otherwise respond to the Complaint is extended to August 23, 2023.

Dated: July 12, 2023

POL SINELLI PC

By: *s/Adam D. Chilton*

Adam D. Chilton
Attorneys for Plaintiffs

1 Dated: July 12, 2023

2 PRHLAW LLC

3 By: /s/Charles H. McCrea

4 Charles H. McCrea

5 Attorneys for Defendant

6 **IT IS SO ORDERED:**

7 

8 _____
9 United States Magistrate Judge

10 DATED: July 14, 2023

CERTIFICATE OF SERVICE

Pursuant to FED. R. CIV. P. 5(b), I hereby certify that I am an employee of PRHLAW LLC and that on this 12th day of July, 2023, I caused the foregoing JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND DEFENDANT'S TIME TO RESPOND TO COMPLAINT BY 30 DAYS (FIRST REQUEST) to be served by the Court's CM/ECF System on all parties and counsel of record.

/s/Charles H. McCrea